



Hurricane Harvey – Texas Unified Command Mission Assignment Transition

Operational Activity Transition Record For Orphan Drum and Container Collection and Spills/Discharges from Facilities In Alpha Branch

To: Susan Clewis
Region 14 Director
Texas Commission on Environmental Quality

From: Hurricane Harvey Unified Command

Thru: Hurricane Harvey - Texas Unified Command for Emergency Support
Function (ESF) #10

EPA Incident Commander

Date: _____

TCEQ Incident Commander

Date: _____

Action	Assignee(s)	Information
Purpose and Background	Operations Section Chief Branch Director	<p>FEMA Interagency Agreement (IAG) and Mission Assignment (MA):</p> <p>1791-DR-TX-EPA-13-00</p> <p>Operational Branch: Alpha</p> <p>Area of Responsibility (AOR)/Counties: Aransas, Bee, Calhoun, De Witt, Goliad, Gonzales, Jackson, Kleberg, Lavaca, Nueces, Refugio, San Patricio, Victoria</p> <p>Operational Category: Assessment, identification, removal and disposal of orphan drums and containers; assessment, identification, abatement, containment, and mitigation of potential or actual discharges/releases from facilities.</p> <p>Authorized Activities: Conduct field operations to remove and dispose of oil and hazardous substances in the form of orphan drums and containers, and conduct field operations to abate, contain, and mitigate potential or actual discharges/releases from facilities.</p> <p>Attachment 1: Mission Assignment and Action Request Forms</p>
Findings	Operations Section Chief Branch Director	<p>Milestones: The Unified Command (UC) conducted response activities to mitigate exposure threats from oil and hazardous substances associated with orphan drums and containers, and potential or actual discharges/releases from facilities. These recovery efforts were focused throughout the affected areas of the Alpha Branch AOR. Some orphan drums and containers were recovered in the incorporated areas while others were associated with the rural and sensitive areas (open water, marsh, and swamp areas) of the County. These orphan drums and containers appeared to have originated from land based businesses, and/or off-shore petroleum operations. All</p>

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		<p>recovery efforts were conducted in such a manner as to avoid or minimize additional damage to the sensitive environments within the Alpha Branch AOR. To this end, prior to beginning recovery operations in an area, both ground and aerial reconnaissance (where applicable) were conducted. The UC was able to gather information on recovery targets, evaluate possible access routes, temporary staging locations (if necessary), determine appropriate equipment needs, and evaluate safety considerations. The UC also assigned unique identifications in its Response Manager database for orphan drum and container targets, and facility spills/discharges.</p> <p>Following the reconnaissance, the UC created tactical maps of all targets located within the Alpha Branch AOR. The UC developed performance guidelines in conjunction with both State and Federal natural resources trustee agencies. The goal of the response effort was to minimize any collateral environmental damage, while mitigating hazardous material threats to public health and environment. When operations were conducted in sensitive habitats, wetlands-experienced personnel documented all activities before, during and after recovery.</p> <p>The UC conducted the following best management practices and conservation measures:</p> <ul style="list-style-type: none"> • Preservation of Existing Habitats: Recovery activities were minimized and focused on the protection of existing vegetation. • Selectivity of Recovery Equipment: Equipment was chosen and employed to avoid or minimize adverse effects to habitat and wildlife. • Spill Prevention: Control and countermeasures were implemented to reduce the risk of spills during recovery operations. <p>A system of grids and zones was created to track</p>

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		<p>collection progress. Upon completion of recovery operations in an area, ground and/or aerial verification was conducted.</p> <p>The UC processed a total of 227 locations through Alpha Branch orphan drum and container operations, and a total of [insert #s] locations through the Alpha Branch facility discharge operations.</p> <p>The UC conducted recovery of orphan drums and containers in Alpha Branch from approximately August 28, 2017 through September __, 2017.</p> <p>Some items were left in place because they were not a hazardous material threat or the contents were emptied and the containers no longer posed a significant public health or environmental risk relative to the likely environmental impact required for removal. Other containers were left in place when owners could be identified and contacted, resulting in the owner performing removal of their items. In addition some containers or spills were referred to other state or local agencies. Containers located on federal land were referred to those agencies which own the land, such as Department of Interior or US Army Corp of Engineer. These items were not addressed under this mission assignment as Federal lands are outside the statutory authority of the Robert T. Stafford Disaster Relief and Emergency Assistance Act.</p> <p>In Alpha Branch, two (2) items remain open and will require recovery or have been referred to the Responsible Party.</p> <p>The UC conducted abatement and mitigation operations regarding facility discharges/releases in Alpha Branch from approximately August 28, 2017 through September __, 2017.</p> <p>The UC identified a [insert total number] facilities that were compromised and had a potential or actual discharge/release into the</p>

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		<p>environment. [Insert number] facilities were closed in Response Manager by transferring the jurisdiction to the proper state agency. [insert number] were transferred to the TCEQ, [insert number] were transferred to the TGLO, and [insert number] were transferred to the RRC. The state agencies will close out these facilities under their normal business practices.</p> <p>On November 12, 2008, TCEQ indicated they were ready to transition recovery activities from ESF-10 Unified Command back to the state.</p> <p>Attachment 2: Alpha Branch Map Showing Recovery Required and Left in Place Orphan Drum and Container Locations by County</p> <p>Attachment 3: Table of Recovery Required and Left in Place Orphan Drums and Containers by County</p> <p>Attachment 4: Chart of Orphan Drum and Container Recovery Totals by Type</p> <p>Attachment 5: Table of Emptied/NonHaz and also Owner Recovered Drums and Containers Left in Place by County</p> <p>Attachment 6: Table of Drums and Containers Referred to an RP or to Another Agency by County</p> <p>Attachment 7: Alpha Branch Map Showing Open Item Facilities Referred to the State Agencies by County</p> <p>Attachment 8: Alpha Branch Table Showing Open Item Facilities Referred to the State Agencies by County</p>
Continuously evaluate operational activities and identify decision point for completion of activity or its transition back to state and/or County.	Operations Section Chief Branch Director	Activity Transition Criteria: Orphaned container collection continued until transitioned to the state. Aside from the targets left open or turned over to the State Agencies and/or Agency contractors, and County contractors all known hazardous material threats were mitigated, but containers that may have sunk, were hidden by debris, or were otherwise unknown to the responders may still be present.
Work with County and State officials to	Branch Director	Strategy details and schedule: Unified Command recovered all identifiable targets. Any

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establish a mission transition strategy (including Outreach strategy) and mission completion schedule.		future containers should be identified and recovered through normal business operations.
Brief Agency contacts on activity completion prior to implementation.	Unified Command	Results: The Unified Command has briefed their respective agency contacts prior to transition.
Concurrently Brief JFO/AFO on activity closeout prior to implementation.	Unified Command	Results: No formal briefing to the JFO/AFO will be required for this activity as each County is closed out.

ATTACHMENT 1
CURRENT FEMA MISSION ASSIGNMENT

ATTACHMENT 2
COUNTY MAP SHOWING RECOVERY REQUIRED AND LEFT IN PLACE
ORPHAN DRUM AND CONTAINER LOCATIONS

ATTACHMENT 3
TABLE OF RECOVERY REQUIRED AND LEFT IN PLACE ORPHAN DRUMS
AND CONTAINERS

ATTACHMENT 4
CHART OF ORPHAN DRUM AND CONTAINER RECOVERY TOTALS BY
TYPE

ATTACHMENT 5
TABLE OF EMPTIED/NONHAZ OR OWNER RECOVERED DRUMS AND
CONTAINERS LEFT IN PLACE

ATTACHMENT 6
TABLE OF DRUMS AND CONTAINERS RECOVERED BY RP OR REFERRED
TO ANOTHER AGENCY

ATTACHMENT 7
**Alpha Branch Map Showing Open Item Facilities Referred to the State Agencies by
County**

ATTACHMENT 8
Alpha Branch Table Showing Open Item Facilities Referred to the State Agencies
by County